

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
SOUTHERN DIVISION**

DARRYL ANDERSON, et al.,

Plaintiffs,

V.

PERDUE FARMS, INC.,

Defendant.

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**CIVIL ACTION NO.  
1:06-cv-01000-MEF-WC**

## **NOTICE OF FILING ADDITIONAL CONSENTS**

Plaintiffs hereby files the following Notices of Consent in connection with the above-titled and numbered actions, attached hereto:

1. Kelvin Anderson
2. Jerome Beacham
3. Henry Bullock
4. L.C. Burkes
5. Linda J. Cummings
6. Scott Laurimore
7. James M. Mckay
8. Brenda Mitchell
9. Anthony Mizell
10. Jeremy Smith
11. Patrick Young
12. Gregory Q. Miller
13. Sharonda Campbell

Dated: July 8, 2008

Respectfully submitted,

/s/ Robert J. Camp

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above and foregoing instrument has been served on all counsel of record in accordance with the Rules of Civil Procedure on this 8th day of July, 2008.

James J. Kelley  
Morgan, Lewis & Bockius LLP  
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Washington, DC 20004  
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Washington, DC 20004  
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s/ Robert J. Camp  
**ROBERT J. CAMP**

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Kelvin Anderson states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at  
[Name of plant]  
the facility located in Dothan AL. I worked at this location from  
[City/State]  
SEPT 5 2004 to JULY 30 2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 26 day of 2006, 2006.

Kelvin Anderson  
[PRINT NAME]

Kevin Anderson  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jerome Beacham states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at  
[Name of plant]  
the facility located in Dothan, AL. I worked at this location from  
[City/State]  
June 2002 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the \_\_\_\_\_ day of \_\_\_\_\_, 2007.

Jerome Beacham Jerome Beacham  
[PRINT NAME] [SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Henry Bullock states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at  
[Name of plant]  
the facility located in Dothan Alabama. I worked at this location from  
[City/State]  
3-3-06 to 3-27-07.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan Alabama, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 27 day of March, 2007.

Henry Bullock  
[PRINT NAME]

Henry Bullock  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

L.C. Burkes

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue at  
[Name of plant]  
the facility located in Dothan Ala. I worked at this location from  
[City/State]  
May 10, 1993 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, Ala, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 30 day of May, 2007.

L.C. Burkes

PRINT NAME

L.C. Burkes

SIGNATURE

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Linda J Cummings states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farm at  
[Name of plant]  
the facility located in Dothan AL. I worked at this location from  
[City/State]  
04 April to 06 May.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farm plant in Dothan AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 02 day of April, 2008.

Linda J Cummings  
[PRINT NAME]

Linda J Cummings  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Scott Laurimore states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly, employed by Perdue  
[Employer]  
at the facility located in Dothan, Alabama. I worked at this  
location from 11/24/03 to 7/14/03.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe that I have not been paid for all compensable time which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.

I understand that this suit may be brought as a collective action covering employees of Defendant. If brought as a collective action under either federal or state law, I consent to join as a plaintiff in such suit.

I swear or affirm that the foregoing Statements are true to the best of my knowledge.

DATED the 8 day of July, 2008

Scott Laurimore  
[PRINT NAME]

P.O. Box 5681  
[PRINT STREET ADDRESS]

334/805-7159  
[PRINT CELL PHONE NUMBER]

Scott Laurimore  
[SIGN NAME]

Dothan, AL 36302  
[PRINT CITY, STATE, ZIP CODE]

—  
[PRINT HOME PHONE NUMBER]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

James M. McKay states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by PERDUE at  
[Name of plant]  
the facility located in DOTHAN AL. I worked at this location from  
[City/State]  
Jan to JUN 03.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the PERDUE Farms plant in DOTHAN, and  
[Name of Plant] [City/State]  
possibly other plants owned by PERDUE Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of SEPT, 2006.

James M McKay  
[PRINT NAME]

James M McKay  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Brenda Mitchell states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly, employed by Perdue Farms  
[Employer]  
at the facility located in Dothan, Alabama. I worked at this  
location from 1-1900 to still working.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe that I have not been paid for all compensable time which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.

I understand that this suit may be brought as a collective action covering employees of Defendant. If brought as a collective action under either federal or state law, I consent to join as a plaintiff in such suit.

I swear or affirm that the foregoing Statements are true to the best of my knowledge.

DATED the 5 day of 29, 2008

Brenda Mitchell  
[PRINT NAME]

101 hance hot  
[PRINT STREET ADDRESS]

229 723-1460  
[PRINT CELL PHONE NUMBER]

Brenda Mitchell  
[SIGN NAME]

PO Box 92 Blakely GA 39823  
[PRINT CITY, STATE, ZIP CODE]

229 723 2501  
[PRINT HOME PHONE NUMBER]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Anthony Mizell states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at  
[Name of Plant]  
the facility located in Dothan, AL. I worked at this location from  
[City/State]  
\_\_\_\_\_ to \_\_\_\_\_.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of 08, 2007.

Anthony L. Mizell  
[PRINT NAME]

Anthony L. Mizell  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jeremy Smith states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at  
[Name of plant]  
the facility located in Dalton AL. I worked at this location from  
[City/State]  
June 16 2005 to Feb. 3-2006.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dalton AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 7 day of march, 2007.

Jeremy Smith  
[PRINT NAME]

Jeremy Smith  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Patrick Young states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly, employed by Perdue Farms Inc.  
[Employer]  
at the facility located in Dothan, Alabama. I worked at this  
location from 1/08 to 4/08  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe that I have not been paid for all compensable time which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.

I understand that this suit may be brought as a collective action covering employees of Defendant. If brought as a collective action under either federal or state law, I consent to join as a plaintiff in such suit.

I swear or affirm that the foregoing Statements are true to the best of my knowledge.

DATED the 3rd day of July, 2008

Patrick Young  
[PRINT NAME]

1107 Cabot St. Apt 1  
[PRINT STREET ADDRESS]

251-458-1100  
[PRINT CELL PHONE NUMBER]

Patrick Young  
[SIGN NAME]  
Dothan, AL, 36301  
[PRINT CITY, STATE, ZIP CODE]

\_\_\_\_\_  
[PRINT HOME PHONE NUMBER]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Gregory G Miller states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly, employed by PerDUE  
[Employer]  
at the facility located in Dothan, Alabama. I worked at this  
location from MAY-2-2007 to AUG-26-2007.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe that I have not been paid for all compensable time which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.

I understand that this suit may be brought as a collective action covering employees of Defendant. If brought as a collective action under either federal or state law, I consent to join as a plaintiff in such suit.

I swear or affirm that the foregoing Statements are true to the best of my knowledge.

DATED the 5-15 day of MAY 15, 2008

Gregory G Miller  
[PRINT NAME]

Gregory G Miller  
[SIGN NAME]

909 Lennox AV  
[PRINT STREET ADDRESS]

Dothan, AL 36303  
[PRINT CITY, STATE, ZIP CODE]

\_\_\_\_\_  
[PRINT CELL PHONE NUMBER]

324-699-1085  
[PRINT HOME PHONE NUMBER]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

ShARONDA Campbell states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly, employed by BBQ-Crib  
[Employer]  
at the facility located in Dothan, Alabama. I worked at this  
location from 01/08 to 06/08.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought against Perdue Farms, LLC to recover unpaid compensation and overtime for violations of the Fair Labor Standards Act. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe that I have not been paid for all compensable time which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff in this lawsuit and to be bound by any decision in this lawsuit or by any settlement of this case.

I understand that this suit may be brought as a collective action covering employees of Defendant. If brought as a collective action under either federal or state law, I consent to join as a plaintiff in such suit.

I swear or affirm that the foregoing Statements are true to the best of my knowledge.

DATED the 06 day of 07, 2008

ShARONDA Campbell  
[PRINT NAME]

3309  
Chargentel Ave  
[PRINT STREET ADDRESS]

214-484-0185  
[PRINT CELL PHONE NUMBER]

Sharonnda Campbell  
[SIGN NAME]

DALLAS, Tx 75215  
[PRINT CITY, STATE, ZIP CODE]

214-426-2237  
[PRINT HOME PHONE NUMBER]